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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. ADAM ALEXANDER WILLIAMS, Defendant.	CR 22-33-BLG-DLC UNITED STATES' SENTENCING MEMORANDUM
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The United States of America, by and through Zeno B. Baucus, Assistant United States Attorney for the District of Montana, provides the Court with this memorandum in aid of sentencing the defendant.

INTRODUCTION

Williams pleaded guilty to a single-count indictment, charging Interference with Flight Crew Members and Attendants, in violation of 49 U.S.C. § 46504. The Pre-Sentence Report has determined that Williams's recommended guideline range is between zero and six months. PSR ¶55. Other than Williams's objection to restitution, which has been resolved between the parties, neither party has any objections to the PSR. Pursuant to the terms of the plea agreement, the United States recommends a sentence of probation.

RESTITUTION

As indicated, Williams has lodged an objection to the amount of restitution sought and as delineated in paragraph 66 of the PSR. However, in advance of sentencing, the parties have come to an agreement concerning restitution. Through discussions between the parties and conferring with the victim in this case, Williams has agreed to pay a total of \$14,500.00 in restitution. This will satisfy the restitution obligation in this case.

THE OFFENSE AND SENTENCING RECOMMENDATION

On January 9, 2022, Williams boarded a cross-country flight from Seattle, Washington to Charlotte, North Carolina. PSR ¶8. A little bit into the flight he began yelling profanities and asking for the location of a "Jasmin Sanders." His behavior escalated and Williams, seated in the window seat, jumped over the two

passengers next to him and on to the beverage cart. *Id.* In doing so, Williams pushed a flight attendant down and proceeded to then run down the aisle of the aircraft. *Id.* After another beverage cart on the aircraft stymied his efforts, a second flight attendant calmed Williams down and returned him to his seat. *Id.*

That was not the end of Williams's disruptions. Approximately ten minutes later he again began yelling profanities and announcing that he was God. PSR ¶9. In response, the flight crew took no chances and seated Williams around a group of United States Marines that happened to be on the aircraft. *Id.* This too did not deter Williams and he subsequently began yelling again while taking his clothes off. This, however, was the straw that broke the camel's back as the captain of the aircraft, understandably concerned for the safety of his passengers and crew, diverted to Billings at which point Williams was removed from the plane. *Id.*

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Pursuant to the plea agreement in this case the United States recommends a sentence of probation. In January of this year Williams undoubtedly put fear into the minds of countless individuals while they crossed the country on an aircraft. His actions generated economic harm to the victim, inconvenienced countless, and for a few moments at least, terrorized several.¹ Consistent with the factors

¹ And, unfortunately, Williams is not the only perpetrator with respect to this epidemic. According to the FAA, there were 721 investigations and 487 enforcement actions with respect

delineated in §3553 and the plea agreement in this case, a sentence of probation is sufficient, but not greater than necessary.

DATED this 11th day of October, 2022.

JESSE A. LASLOVICH
United States Attorney

/s/ Zeno B. Baucus
ZENO B. BAUCUS
Assistant U.S. Attorney

to unruly passengers this year as of October 4, 2022. *See*
https://www.faa.gov/data_research/passengers_cargo/unruly_passengers